

REGIONAL WATER MANAGEMENT FOUNDATION

a subsidiary of Community Foundation Santa Cruz County

California Department of Water Resources
Division of Integrated Regional Water Management
Financial Assistance Branch
Post Office Box 942836
Sacramento, CA 94236
Attn: Zaffar Eusuff

RE: Comments on Prop 84 IRWM Round 2 Implementation Draft Proposal Solicitation Package

Dear DWR IRWM Program Staff:

Thank you for the opportunity to comment on the Proposition 84 Implementation Round 2 Proposal Solicitation Package (PSP). We commend DWR on the thorough preparation and guidance provided in the PSP. Please consider the following comments and suggestions from the Santa Cruz Region IRWM Partner Agencies.

1. Application Scoring should be better balanced between important scoring criteria. We feel the important components of a proposal are the Work Plan, Budget, Technical Justification and how well it meets DWR's Program Preferences. However the scoring criteria is skewed towards the Benefit & Cost Analysis (30 points) and is too low for some of the other criteria.
2. DWR requests a good deal of information for both the Work Plan and the Budget scoring criteria, and we agree that these are important factors. Therefore we recommend these scores should be increased to a max of 20 points for the Work Plan and 10 points for the Budget.
3. We like the non-monetized benefit analysis that is included in the PSP, however it isn't clear how these benefits get factored into the final score for this criteria. A better explanation or some examples would be very helpful.
4. Please consider an update or addendum to the 2008 Economic Analysis Guidebook. There are some new understandings and new tools (such as InVest and SERVES (Simple and Effective Resource for Valuing Ecosystem Services) since 2008. It would be helpful to have some way of knowing how similar resources where/are valued in other regions.
5. The economic analysis can be one of the most onerous and expensive aspects of the IRWM grant proposal, yet it does not produce much in the way of helpful information at the regional level. Perhaps in the future, as new tools make this analysis easier this will not be the case. But for now, DWR should reduce the amount of cost-benefit information and analysis required by each region.
6. The State Coastal Conservancy should have a strong role in reviewing IRWM Proposals in coastal regions. All Reviewers, regardless of the agency, in should be cross-trained for multiple state-agency objectives.
7. Please clarify the prohibition on travel costs – for example, would hotel expenses for a construction manager be eligible for reimbursement? or is this prohibition focused on travel to conferences, etc.?
8. In Table 3 "Resources Management Strategies" the category "Practice Resources Stewardship" should include the strategy "evaluate natural capital"

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9. Page 52 - The categories "Watershed Management" and "Habitat Improvement" should include a project type "Implement Ecosystem Credit and Water Quality Trading Programs"
10. General Comment - Ensure that Statewide Priorities are completely up-to-date. For example, the Department of Conservation oversees the Sustainable Communities Grant Program and the Urban Greening Grant Program- both of which have objectives that are in right line with IRWM. We suggest DWR invite the Department of Conservation into the process of reviewing projects and guidelines and take steps to foster greater integration at the state agency level.
11. Sources of funding options on page 56 should specifically include "payments for ecosystem services"

If you have questions please contact Tim Carson, Regional Water Management Foundation, tcarson@cfsc.org.

Thank you for your consideration of the comments.

Santa Cruz IRWM Region